

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	No. 2:19-cr-00013
v.	)	Chief Judge Crenshaw
	)	
GEORGIANNA A.M. GIAMPIETRO	)	

**UNITED STATES' SEPARATELY PROPOSED JURY INSTRUCTIONS**

The United States of America, by and through its attorneys, the Acting United States Attorney for the Middle District of Tennessee and the Chief of the Counterterrorism Section of the National Security Division, United States Department of Justice, hereby files the Government's Separately Proposed Jury Instructions regarding those specific instructions upon which the parties could not agree after extensive consultation.

The Government specifically objects to any instructions submitted as part of the defendant's separately filed jury instructions. Moreover, the Government specifically objects to defense counsel's separately submitted jury instruction for Count One as the Government does not believe unanimity as to the means by which the defendant committed Count One is necessary. Contemporaneously with this filing, the Government is submitting a memorandum in support of its position on Count One.

Respectfully Submitted,

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By: /s/ Kathryn Risinger  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2021, I electronically filed one copy of the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to counsel for all defendants in this case.

/s/ Kathryn D. Risinger  
KATHRYN D. RISINGER  
Deputy Criminal Chief